

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(MIAMI DIVISION)**

JANE DOE,

Plaintiff,

CASE NO: 1:25-cv-20757-JB/Torres

v.

STEVEN K. BONNELL II,

Defendant.

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO FILE
REPLY TO DEFENDANT'S RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION
TO COMPEL LOLCOW LLC TO REMOVE VIDEOS (D.E. 80)**

Plaintiff, JANE DOE, hereby files her Motion for Extension of Time and requests a one-week extension to file her Reply to Defendant's Response in Opposition to Plaintiff's Motion to Compel LOLCOW, LLC to Remove Videos (D.E.80), and as grounds therefore states:

1. Defendant filed a Response in Opposition to Plaintiff's Motion to Compel LOLCOW, LLC to Remove Video (D.E. 83) and the Replies are due on 6/6/2025.
2. The Plaintiff respectfully requests a one-week extension of the current deadline 6/6/2025 to adequately reply to the defendant's response in opposition (D.E. 83). This extension is required as Plaintiff's counsel requires additional time to complete research responsive to the motion as to fully address the legal issues raised in the opposition. This brief deadline is not intended to cause delay, will not prejudice any of the parties, is made in good faith and in the interest of justice.
3. Federal Rule of Civil Procedure 6(b) allows for an extension of time where, as here, a party shows good cause and requests an extension before the expiration of the period originally

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prescribed. *See* Fed. R. Civ. P. 6(b)(1). “[A] timely motion to extend . . . should be liberally granted absent a showing of bad faith or undue prejudice.” *Hunter v. Riverbend Corr. Facility*, No. 22-11599, 2023 WL 6389817, at *3 (11th Cir. Sept. 29, 2023).

WHEREFORE, the Plaintiff, JANE DOE, respectfully requests that this Court enter an Order granting this motion and extending the time for her to reply to the defendant’s response (D.E. 83).

CERTIFICATE OF CONFERRAL PURSUANT TO LOCAL RULE 7.1(a)(2)

WE HEREBY CERTIFY that the undersigned counsel for movant made meet and confer efforts via email to confer with opposing counsel regarding the relief sought in this motion. Opposing counsel takes no position on the motion at this time while reserving the right to oppose the motion should he feel the basis for the requested extension is unjustified.

Dated: June 4, 2025.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 4, 2025 a true and correct copy of the foregoing was served on all parties via the CM/ECF filing portal to all counsel of record.

By: /s/ Carlos A. Garcia Perez

CARLOS A. GARCIA PEREZ
Attorney for Plaintiff